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*ATTORNEY FOR DEFENDANT*  
*Shalom Ifrah*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
CALIFORNIA**

<b>UNITED STATES OF AMERICA,</b>	) <b>CASE NO. 2:22-cr-00046-WBS</b>
	) <b>AMENDED</b>
<b>Plaintiff,</b>	) <b>STIPULATION TO ALLOW</b>
	) <b>DEFENDANT IFRAH TO TRAVEL</b>
	) <b>TO AND FROM TEL AVIV ISRAEL</b>
<b>vs.</b>	) <b>DECLARATION OF DAVID E.</b>
	) <b>KENNER: ATTACHMENTS A AND B</b>
	)
	) <b>[PROPOSED] ORDER LODGED</b>
<b>SHALOM, IFRAH ET AL.,</b>	) <b>HEREWITH</b>
<b>Defendants.</b>	)
_____	)

IT IS HEREBY STIPULATED by and between Phillip Talbert, United States Attorney, through Roger Yang, Assistant United States Attorney, attorney for Plaintiff, and David E. Kenner, attorney for defendant Shalom Ifrah that the defendant may travel to and from Tel Aviv Israel, on July 9, 2024, and returning on July 22, 2024. It is further ordered that Mr. Ifrah can pick-up his U.S. and Israeli Passports from Pre-trial Services within 48 hours of his departure and return it to them within 24 hours of his return.

This request is supplemented by the declaration of undersigned counsel, Exhibits A and B and all the files and records in this case.

1 **IT IS SO STIPULATED**

2 Respectfully submitted,

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5 Dated: July 8, 2024

/s/\_\_\_\_\_  
6 DAVID E. KENNER  
7 For Defendant  
8 SHALOM IFRAH  
9

10 Dated: July 8, 2024

/s/\_\_\_\_\_  
11 ROGER YANG  
12 Assistant United States Attorney  
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**IN THE UNITED STATES DISTRICT COURT  
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<b>UNITED STATES OF AMERICA,</b>	)	<b>CASE NO. 2:22-cr-00046-WBS</b>
	)	
<b>Plaintiff,</b>	)	
	)	<b>[PROPOSED] ORDER</b>
	)	
<b>vs.</b>	)	
	)	
	)	
<b>SHALOM, IFRAH ET AL.,</b>	)	
<b>Defendants.</b>	)	
_____	)	

IT IS HEREBY ORDERED THAT Shalom Ifrah, the defendant, may travel to and from Tel Aviv Israel, on July 9, 2024, and returning on July 22, 2024. It is further ordered that Mr. Ifrah can pick-up his U.S. and Israeli Passports from Pre-trial Services within 48 hours of his departure and return it to them within 24 hours of his return.

**IT IS SO ORDERED.**

Dated: July 8, 2024

  
\_\_\_\_\_  
JEREMY D. PETERSON  
UNITED STATES MAGISTRATE JUDGE

**DECLARATION OF DAVID KENNER**

David E. Kenner declares:

1. I am the attorney of record for the herein defendant, Shalom Ifrah.
2. Attached as Exhibit A is a true and correct copy of a receipt showing that, on July 9<sup>th</sup>, 2024, Mr. Ifrah purchased tickets for his trip from LAX to Tel Aviv Israel and back to LAX.
3. Attached as Exhibit B is a true and correct copy of an email from Shalom Ifrah to me Dated June 26th, 2024. That includes the dates of travel and the location where he will be staying in Tel Aviv (Sderot HaAtsma'ut 37 floor 5 apt #13. Bat Yam Israel: 5939524) The Phone number at that location is (+972528373603)
4. Attached As Exhibit C is a true and correct copy of an email dated June 17<sup>th</sup>, 2024, from Mr. Ifrah to me reflecting that the reason for his travel request is to attend the wedding of a childhood friend.
5. I have met and conferred with, AUSA Roger Yang and he has no objection to the court granting this request. Further, they do not oppose Mr. Ifrah' traveling without the location monitoring equipment. See Exhibit D true and correct copy of an email from AUSA Roger Yang to me received July 8<sup>th</sup>, 2024, stating the aforementioned.

I declare under penalty of perjury, according to the laws of the United States of America, that the foregoing is true and correct this 8<sup>th</sup> day of July 2024, at Encino, California.

\_\_\_\_\_/s/\_\_\_\_\_  
David E. Kenner  
Attorney at Law